Sprint

July 6, 2015

Technical Director
File Reference No. 2015-260
Financial Accounting Standards Board
401 Merritt 7
PO Box 5116
Norwalk, CT 06856-5116
Sent via email: director@fasb.org

Re: Proposed Accounting Standards Update, *Business Combinations (Topic 805): Simplifying the Accounting for Measurement Period Adjustments*

We appreciate the opportunity to comment on the Proposed Accounting Standards Update, *Business Combinations (Topic 805): Simplifying the Accounting for Measurement Period Adjustments* ("Proposed Update").

We support the Board's initiative to make improvements to areas of generally accepted accounting principles, particularly those that both result in reduced cost and complexity while at the same time maintaining or improving the usefulness of the information provided to financial statement users. We believe that the Proposed Update will result in reduced cost and complexity for preparers and that the disclosure requirements will maintain, if not improve, the usefulness of information provided to users. As a result of recording measurement period adjustments in the current reporting period, including the cumulative earnings impact as if the adjustment was initially recorded at the date of acquisition, we believe this may more effectively highlight the impact of the adjustments on prior and current periods for financial statement users.

Our responses to the questions posed by the Board in the Exposure Draft are included in the appendix to this letter. The questions posed are included in textboxes followed by our responses. Unless the context otherwise requires, references to "our," "us," or "we" mean the management of Sprint Corporation.

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We appreciate the opportunity to express our views and would be pleased to discuss our comments or answer any questions that the Board or its staff may have. Please direct any questions to me at (913) 439-4607.

Sincerely,

John J. Mutrie, Jr.

John J. Mutrie, Jr.
Assistant Controller
Sprint Corporation

Appendix: Responses to Questions for Respondents

Question 1: Should adjustments to provisional amounts and the corresponding adjustment to goodwill that are identified during the measurement period be recognized in the reporting period in which the adjustment amount is determined? Why or why not?

Sprint's Response: We agree with the Board's Proposed Update to record measurement period adjustments to provisional amounts in the current reporting period rather than by retrospective adjustment to previously issued financial statements. We believe that the proposed approach simplifies financial reporting and reduces cost.

Question 2: If adjustments to provisional amounts as of the acquisition date would have affected earnings in periods subsequent to the initial accounting for the business combination, should the effect on earnings, in periods prior to the adjustment period, of changes in depreciation, amortization, or other income effects be recognized in the income statement in the reporting period in which the adjustment to the provision amount is determined? Why or why not?

Sprint's Response: Consistent with our response to Question 1, we believe that the impact of adjustments to provisional amounts on earnings should be recognized in the income statement in the reporting period in which the adjustments are determined. We also believe that the current period recognition will enable financial statement users to more clearly see the impact of the adjustments and the financial reporting process will be simplified.

Question 3: Should the proposed guidance be applied prospectively to adjustments made to provisional amounts that are identified after the effective date and that are within the measurement period? Why or why not?

Sprint's Response: We agree with the Board's proposal to apply the proposed guidance prospectively to measurement period adjustments identified after the effective date. We do not believe that there would be any benefit of retrospective application of the proposed guidance. We also considered whether the guidance should be applied prospectively to business combinations after the effective date rather than to measurement period adjustments; however, given the Board's stated objectives as well as our belief that the Proposed Update may enhance transparency of the adjustments for users, we agree with the proposed transition requirements.

Question 4: How much time will be necessary to adopt the amendments in this proposed Update? Should early adoption be permitted? Should the amount of time needed to apply the proposed amendments by entities other than public business entities be different from the amount of time needed by public business entities?

Sprint's Response: We expect that adoption of the Proposed Update will result in less effort than existing guidance, thus minimal time will be necessary to adopt the amendments. We also support early adoption. We do not believe that additional time would be needed to apply the proposed amendments by entities other than public entities.